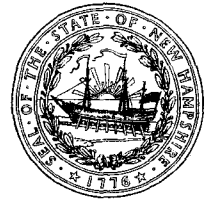




The State of New Hampshire
Department of Environmental Services



Michael P. Nolin
Commissioner

December 1, 2005

Mr. John Bowkett
Senior Vice President
Nu-Cast, Inc.
29 Grenier Field Road
Londonderry, New Hampshire 03053

CERTIFIED MAIL (7099 3400 0018 1290 6719)
RETURN-RECEIPT REQUESTED
LETTER OF DEFICIENCY
No. ARD 05-016
(Sta.S)

RE: Nu-Cast, Inc., 29 Grenier Field Road, Londonderry, New Hampshire

Dear Mr. Bowkett:

On June 25, 2005, the New Hampshire Department of Environmental Services, Air Resources Division ("DES") conducted a compliance inspection/complaint investigation at Nu-Cast, Inc., ("Nu-Cast") at 29 Grenier Field Road in Londonderry, New Hampshire. The purpose of the inspection was to determine Nu-Cast's compliance status with the N.H. Administrative Rules Env-A 100 *et seq.*, NH Rules Governing the Control of Air Pollution.

The Air Toxic Control Act, RSA 125-I, requires a owner or operator of a facility that emits a regulated toxic air pollutant ("RTAP") any time after May 8, 2001, to either demonstrate that the uncontrolled emissions of the RTAP do not exceed ambient air limits ("AALs"), as established in Env-A 1400, *Regulated Toxic Air Pollutants*, or apply for an air permit from DES that will limit emissions to ensure compliance with the AALs. If the owner or operator wants to demonstrate that the facility does not exceed any AALs so that a permit is not required, then a compliance demonstration must be performed in accordance with one of the methods provided in Env-A 1405. The owner or operator must retain documentation at the facility of that demonstration, as required by Env-A 1403.01(d), and provide it to DES upon request, as required by Env-A 1405.01(b).

As a result of the inspection and file review, this Letter of Deficiency ("LOD") is being sent to identify the following deficiencies:

1. As a precision aluminum investment casting facility in operation since at least 1986, Nu-Cast may be emitting RTAPs such as aluminum oxide, aluminum dust, and silica. Nu-Cast does not hold a DES air permit. At the time of the compliance inspection, Nu-Cast could not provide documentation of compliance with the AALs, as requested by the DES inspector, pursuant to Env-A 1405.01(b).
2. Env-A 2002.02 states that the owner or operator shall not cause or allow average opacity from fuel burning devices installed after to May 13, 1970 in excess of 20% for any continuous 6-minute period. Nu-Cast operates a bake-out oven that, on the day of the DES inspection, was observed to have emissions with greater than 20% opacity.
3. Env-A 902.01 requires the owner or operator of any stationary source, area source or device to record and maintain information at the facility including, but not limited to, production data, material usage, material safety data sheets and fuel consumption. At the time of the inspection, Nu-Cast did not have all of these records available.

DES believes that the deficiencies can be resolved by Nu-Cast taking the following actions:

1. By **January 12, 2006**, submit to DES records indicating the total amount of aluminum alloy used in production for calendar years 2000, 2001, 2002, 2003 and 2004.
2. By **January 12, 2006**, submit to DES records indicating the total amount of fuel and the sulfur content of the fuel used at the Nu-Cast facility in calendar years 2000, 2001, 2002, 2003 and 2004.
3. By **January 12, 2006**, submit to DES the Material Safety Data Sheets for aluminum alloys and other chemicals used at Nu-Cast.
4. By **January 12, 2006**, submit to DES a compliance demonstration in accordance with Env-A 1405. If the demonstration shows that the facility is not in compliance with Env-A 1400, then Nu-Cast shall also submit to DES by **January 12, 2006**, a permit application.
5. By **January 12, 2006**, submit to DES a plan for controlling emissions from the bake-out oven stack to meet the opacity standard of 20%.

In the event compliance is not achieved within the time periods indicated, DES may initiate formal action against Nu-Cast, including issuing an order requiring the deficiency to be corrected, and/or referring this matter to the NH Department of Justice for imposition of civil and/or criminal penalties.

Please address all information to Barbara Hoffman, at the following address:

NHDES Air Resources Division
Enforcement Section
29 Hazen Drive
P.O. Box 95
Concord, NH 03302-0095

Please be advised that DES will continue to monitor the compliance status of Nu-Cast and that this letter does not provide relief against any other existing or future violations. It is important that Nu-Cast be aware of all the applicable regulations.

If you have questions regarding compliance with Env-A 100 et seq., NH Rules Governing the Control of Air Pollution, or require further information, please contact Barbara Hoffman at (603) 271-7874, Air Resources Division, Compliance Bureau. A current copy of the Air Resource Division rules can be obtained from the DES website at <http://www.des.nh.gov/rules/air.htm> or by contacting the Public Information Center at (603) 271-2975.

Sincerely,


Pamela G. Monroe
Compliance Bureau Administrator
Air Resources Division

PGM/asb

Enclosures: Env-A 1400
ARD-1 Form
ARD-3 Form

cc: G. Hamel, DES Legal Unit Administrator
R. Kurowski, EPA Region 1
Tom Dolan, Chair, Town Council, Town of Londonderry
AFS # 3301590300